

1           A     I first recall seeing this license when my  
2 attorney, Mr. McVea, got it from the FCC after we retained  
3 him.

4           Q     Okay. Can you tell me approximately what year  
5 that was?

6           A     I believe it was March of 1999. It was right  
7 before we filed the declarations with the FCC.

8           Q     Okay. And by that declaration, you mean this  
9 particular exhibit? And if you would turn to page 7?

10          A     Yes.

11          Q     So just before April 1999?

12          A     Yes, sir.

13          Q     Okay. So you don't recall receiving this at your  
14 house, it having been mailed to your house?

15          A     I don't remember if I received it at my house, no.

16          Q     Okay. So you don't recall either way?

17          A     No, I don't recall either way.

18          Q     What would you have done with it if you received  
19 it at your house?

20                MR. ROMNEY: Objection. Calls for speculation,  
21 Your Honor.

22                JUDGE STEINBERG: Sustained.

23                BY MR. KNOWLES-KELLETT:

24          Q     Would you have had a normal practice if you  
25 received FCC type mailings at your house?

1           A     I would think I would have opened it. I can't say  
2     that for sure. Normal practice, I suppose, would be to pass  
3     it on to Ron and Pat Brasher.

4           Q     Okay. Do you recall doing that with other FCC  
5     mailings at all?

6           A     The only thing I remember getting in the mail was  
7     the little card some time in '96 and I remember passing that  
8     on, but as far as anything after that, I don't remember  
9     getting anything in the mail.

10          Q     Okay. Could you look at page 12 of this exhibit?

11          A     Okay.

12                JUDGE STEINBERG: Passing it on to Ron and Pat?  
13     When you said passing it on, you mean to Ron and Pat?

14                THE WITNESS: Yes.

15                JUDGE STEINBERG: Thank you.

16                BY MR. KNOWLES-KELLETT:

17          Q     Did you actually give it to Ron and Pat or did you  
18     pass it --

19          A     I would pass it through my mother and my mother  
20     would -- I didn't see Ron and Pat on a regular basis at that  
21     point, in '96.

22          Q     Okay. But your mother would have?

23          A     Yes. Because she was still working for my dad and  
24     she would at least see them monthly when they were doing the  
25     accounting. I was no longer employed by my father at that

1 time.

2 Q Okay. All right. When you talked about the card  
3 that you received, Exhibit 12, does that have something to  
4 do with the card?

5 A I guess. I assume one of these cards is the one  
6 I got. I didn't really read the card or understand it.  
7 I can't even tell you what color it is. I know there's a  
8 green card and a yellow card, but I can't tell you which one  
9 I got.

10 Q Okay. Do you know there's a green card and yellow  
11 card due to things you learned subsequently?

12 A Yes, sir. Due to this letter, actually.

13 Q Okay. Now --

14 JUDGE STEINBERG: Which letter?

15 THE WITNESS: The one that this card -- these two  
16 copies of this card came with this letter which is number 11  
17 that my uncle mailed to me.

18 JUDGE STEINBERG: Okay.

19 THE WITNESS: Okay.

20 JUDGE STEINBERG: That's the first time you --

21 THE WITNESS: Well, I knew of a card, but I didn't  
22 know there was actually a green and yellow card, there was a  
23 difference. That's what I'm trying to say.

24 BY MR. KNOWLES-KELLETT:

25 Q Okay. So you did receive a card at your house?

1 A I believe I did.

2 Q Okay. And you passed it through your mother.

3 A Yes, sir.

4 Q Okay. Did you have any discussion with anybody at  
5 DLB regarding the card at that time?

6 A No, sir.

7 Q How did you know to pass it to them?

8 A Probably because it said FCC on it and I knew that  
9 was my uncle's business and I knew my mother was getting  
10 mail from the FCC, so -- I don't remember exactly the  
11 circumstances, I don't remember if my mother called me and  
12 told me to give it to her to give it to Aunt Pat or if  
13 I just did. I just really don't remember. But, I mean, it  
14 was knowledge in my family that the FCC was Ronald's  
15 business or dealt with Ronald's business.

16 Q Okay. I'd like you to turn to page 9 -- I take  
17 that back. Could you turn to Exhibit 1?

18 A Okay.

19 Q Do you recognize this document?

20 A Yes, sir. I do.

21 Q Okay. If I refer to this as the Net Wave  
22 petition, is that what you are familiar with?

23 A Yes, sir.

24 Q Did you receive this document in the mail?

25 A Yes, I did receive this.

1           Q     Okay.  What did you do when you received this  
2 document in the mail?

3           A     When I received this document, I actually opened  
4 it and read it.

5           Q     Okay.  And then what happened next?

6           A     Well, I read it and I didn't fully understand the  
7 implications other than it sounded like we were in big  
8 trouble, so I took it to work with me the next day and our  
9 managing partner in our firm is also an attorney as well as  
10 a CPA, and I took it to him, his name is Marty Davis, and  
11 I took it to Marty and I said, "I don't understand this."

12                     And I said, "It sounds like I've done something  
13 illegal."

14                     And he said, "My God, what have you gotten  
15 yourself into?"

16                     And he started reading it and he said, "That's  
17 exactly what it sounds like and how did you get in this?"

18                     And I started proceeding to tell him that my  
19 uncle -- that these were my uncles and my aunts and my  
20 cousins and stuff and he said, "You need to seek counsel."

21           Q     Okay.  Did you talk to anybody at DLB at or around  
22 this time?

23           A     Well, yes, after I talked to Marty, I had gotten  
24 real scared and I had talked to my dad and my dad had  
25 already received his and he said he had talked to Ronald and

1     that Ronald had told us that we hadn't done anything wrong  
2     and that, you know, just to let him handle it.

3             And so being that I'm a CPA, I was a little bit  
4     concerned that it looked like even if I wasn't in something  
5     illegal, that I was at least in something unethical and  
6     I was afraid I could lose my license, so I proceeded to get  
7     on the phone that afternoon and call my Aunt Pat up and talk  
8     to her about it.

9             Q     What did she tell you?

10            A     She just reassured me that we hadn't done anything  
11     wrong and that, you know, they were taking care of it and  
12     she proceeded to put my uncle on the phone.

13            Q     And what did your uncle tell you?

14            A     He told me the same thing, that we hadn't done  
15     anything wrong. I kept saying I don't remember signing  
16     this, I don't know how I got in this.

17                   He told me that I had signed it and I kept saying  
18     I don't remember signing anything Hill and he said that --  
19     because at that point, I had not been married very long, and  
20     he said that I had signed it and just not to worry about it  
21     and he'd take care of it.

22            Q     Do you recall ever giving your uncle permission to  
23     use your name to obtain FCC licenses?

24            A     I think that I signed a license when I was still  
25     Jennifer Sumpter and I think it was in the early 1900s.

1 Q Okay. Did that come up in any way with this?

2 A I told Uncle Ronald -- I feel like I told him --  
3 this is me trying to remember what our conversation was --  
4 I believe I told him that I don't remember signing anything  
5 Hill, I only remember signing something Sumpter. And he  
6 told me that once he had my name, he could use it again and  
7 again. And that's not verbatim, but that seems like that  
8 was the gist of the conversation.

9 And, again, I repeated to him I don't remember  
10 signing anything Hill and he just kind of told me not to  
11 worry about it, that it would be fine.

12 Q Do I take from your answer correctly that you're  
13 fuzzier on this part of the conversation than on other parts  
14 of the conversation?

15 A I'm fuzzy on all the conversation, but that's the  
16 gist of it. I can't tell you verbatim, word for word, what  
17 we said. You have to understand that I was real upset at  
18 the time and I had just gotten this thing the day before,  
19 I didn't know what was going on, I don't understand anything  
20 about the radio business.

21 You know, I didn't even understand the language of  
22 this petition other than it was just ominous and something  
23 was going on that I didn't understand and I was trying to  
24 get reassurance because this was my family and I was trying  
25 to have reassurance that I hadn't done anything illegal and

1 he just kept telling me it was okay.

2 Q If you want to take a break, the judge --

3 A I'm all right.

4 Q Okay. Could you turn to -- check the date on  
5 that. There's a received date on the front of the exhibit.

6 MR. ROMNEY: Your Honor, could we have a  
7 description for the record of what we're talking about?

8 JUDGE STEINBERG: Exhibit 1.

9 MR. ROMNEY: Thank you.

10 THE WITNESS: I think it says November 17, 1997.

11 BY MR. KNOWLES-KELLETT:

12 Q So roughly, we're talking mid November 1997?

13 A Yes.

14 Q There are a couple of days -- there's another on  
15 November 19th, so --

16 A Yes. I see that one, too.

17 Q For purposes of this, I'm just looking for a  
18 rough -- I'd like you to turn your attention back to Exhibit  
19 55 and this time to page 9 of that exhibit.

20 A Okay.

21 Q With respect to that date, mid November 1997, is  
22 that when you think you received the Net Wave petition?

23 A Yes, sir. I do.

24 Q Do you see this letter dated 11/17/97?

25 A Yes, sir.



1 Q Okay. Is that your address?

2 A Yes, sir.

3 Q Okay. Do you recall receiving this letter?

4 A Yes, sir.

5 Q Okay. What did you do with the letter?

6 A I threw it in the trash.

7 Q Okay. And why did you throw it in the trash?

8 A I was angry. I felt like Ronald was blowing me  
9 off. I had already talked to him -- I had received the Net  
10 Wave thing first, the petition, and I felt like he was  
11 blowing me off, so I was very angry and when I got this and  
12 it told me I had to fill all this stuff out and if I didn't  
13 fill it out, whatever, I just got angry. I threw it in the  
14 trash.

15 Q Okay. The handwriting in this letter, was that on  
16 it when you received it?

17 A No, sir.

18 Q Okay. So you received this letter without the  
19 handwritten information.

20 A Yes, sir. And I threw that in the trash.

21 Q Okay. This handwritten information, do you know  
22 how it got on there?

23 A I know that this filled out one was brought to my  
24 father by Uncle Ronald. Or this is my understanding. And  
25 it was brought to my dad for me to sign and was left with my

1 dad for me to sign and I at that point told my dad I was not  
2 going to sign it.

3 Q Okay. Can you look at Attachment D to this  
4 exhibit?

5 MR. ROMNEY: Could we have a page number, please,  
6 Your Honor?

7 MR. KNOWLES-KELLETT: 16. Page 16.

8 BY MR. KNOWLES-KELLETT:

9 Q Did you receive this letter?

10 A Yes, I did.

11 Q Okay. And did you receive it on or about March  
12 31, 1998?

13 A Yes, I did.

14 Q Okay. What did you do with this letter?

15 A I didn't throw it away. I just kept it. Me and  
16 my dad kept it.

17 Q Okay. Did you respond to the FCC?

18 A No, sir. I did not.

19 Q Did you discuss the letter with anybody at DLB?

20 A No, sir. I did not.

21 Q Did you read the letter at that time?

22 A Yes, I did.

23 Q Did you understand that the license would be  
24 canceled at that time?

25 A Yes, and that's what I preferred.

1 Q Okay. Could you look at Attachment C to that  
2 exhibit?

3 JUDGE STEINBERG: What page, please?

4 MR. KNOWLES-KELLETT: I'm sorry, Your Honor.

5 MS. LANCASTER: Page 13.

6 MR. KNOWLES-KELLETT: It's actually page 14 that  
7 I want you to look at.

8 THE WITNESS: Okay.

9 BY MR. KNOWLES-KELLETT:

10 Q Is that your signature?

11 A Yes, sir.

12 Q Okay. And do you see at the top that this is an  
13 assignment of authorization?

14 A Yes, sir.

15 Q For call sign WPJR740?

16 A Yes, sir.

17 Q From you, Jennifer Hill, to DLB dba Metroplex?

18 A Yes, sir.

19 Q Okay. How did you come to sign this document?

20 A Ronald brought this to my dad for all of us to  
21 sign.

22 Q Okay. And you agreed to assign your interest in  
23 the radio station to Ronald?

24 A Yes, because I thought I could transfer it to him  
25 and my name would be out of this.

1 Q Okay. Can you look at Exhibit 56? The letter  
2 apparently from you to Ronald and Pat Brasher November 29,  
3 1997. Is that correct?

4 A Yes, sir. Yes, sir.

5 Q Did you write this letter?

6 A Yes, I did.

7 Q Okay. Did you write it with anybody else?

8 A I don't remember the particulars of these letters.  
9 I know my parents sent one and my sister sent one and  
10 I believe I took the language that my mom and dad -- I  
11 believe my dad wrote the one for my mom and my dad and my  
12 sister and I think I took the language and wrote my own.

13 Q Okay. And in the second paragraph, when it says  
14 "Please remove my name from this channel," do you see that?

15 A Yes, sir.

16 Q Is the assignment application that we were looking  
17 at the result of that request?

18 A Yes, I believe so.

19 Q Okay. Do you know where this station was to be  
20 put up?

21 A No, sir.

22 Q Okay. Did you ever know where this station was to  
23 be put up?

24 A I think I know now it's in Allen.

25 Q Okay. Do you know now it's Allen?

1 A Yes, sir.

2 Q When did you learn it was in Allen?

3 A Really in the deposition. I hadn't even read the  
4 license until you pointed it out to me in the deposition  
5 that it was in Allen.

6 Q Okay. Do you know where Allen is?

7 A Yes, sir. I do.

8 Q Okay. Could you describe where it is?

9 A It's north of Plano. My husband works in Allen,  
10 actually.

11 Q Okay. So it's north of Dallas?

12 A Dallas, yes. Downtown.

13 Q Okay. Did you know anything about a big concrete  
14 customer of DLB needing coverage in Allen?

15 A No, sir.

16 Q Okay. Did you know anything about a big concrete  
17 customer --

18 A No, sir. No, sir.

19 Q Okay. Did you ever agree to help fund this  
20 system?

21 A No, sir.

22 Q Did you ever help find customers --

23 JUDGE STEINBERG: Go back to your last question.

24 I don't know that Mrs. Hill knows what "this system" is.

25 MR. KNOWLES-KELLETT: Okay.

1 JUDGE STEINBERG: Her station or her license or  
2 whatever.

3 MR. KNOWLES-KELLETT: Okay.

4 BY MR. KNOWLES-KELLETT:

5 Q Did you understand this station to authorize a  
6 repeater at Allen, Texas?

7 A Yes, sir.

8 Q Okay. And you understand what a repeater is?

9 A I think so.

10 Q Okay. Can you explain your understanding of what  
11 a repeater is? I know it's a scary question.

12 A I think the repeater is the big radio tower that  
13 the little two-way radios that he puts in different trucks  
14 and cars and stuff, it bounces off that, that gives people  
15 their service. Like enables them to talk to other two-way  
16 radios on that channel.

17 Q I've been at the FCC for nearly ten years and I'm  
18 not sure I'd do as well.

19 Okay. Do you know if the system is operating  
20 today?

21 A No, I do not.

22 Q Okay. Do you know if it has ever operated?

23 A I don't know.

24 Q Has anybody at DLB told you that it's operating?

25 A No, sir.

1 Q Have you ever helped find customers for DLB?

2 A No, sir. I have not.

3 Q Have you ever agreed to help find customers for  
4 DLB?

5 A No, I have not.

6 Q Have you ever participated in the operation of the  
7 station?

8 A No.

9 Q Okay. Have you ever risked any money with respect  
10 to the station?

11 A No, sir. I have not.

12 Q Purchased any insurance?

13 A No, sir.

14 Q Okay. Gone to the repeater site?

15 A No, sir.

16 Q Taken out any loans?

17 A No, sir.

18 Q Signed for any loans?

19 A No, sir.

20 Q Do you know when it was constructed?

21 A No, sir. I do not.

22 Q Putting aside whether or not you ever agreed to  
23 let DLB use your name for this license, did you ever  
24 participate in any way in the operation of the station?

25 A I don't believe I did no.

1           Q     Okay. I'm putting aside from signing the  
2 assignment form.

3           A     Okay.

4           Q     Okay?

5           A     No, I did not.

6           Q     Okay. Did you ever have any other conversations  
7 with anybody from DLB about these licenses?

8           A     Not to my knowledge.

9           Q     That's all I'm asking for. Okay. I'd like you to  
10 pick up the other book --

11                JUDGE STEINBERG: The big thick one.

12                MR. KNOWLES-KELLETT: It's Exhibit 19. It's such  
13 a big compendium of papers that we put it in its own  
14 notebook.

15                At the bottom, once you get past the first 20  
16 pages or so, at the bottom you'll find six-digit numbers and  
17 I'd like you to turn to page 00208. So 208. Actually, it's  
18 an application that starts on 207 and continues to 212.

19                JUDGE STEINBERG: Those page numbers are a little  
20 hard to see.

21                MR. KNOWLES-KELLETT: I'd like you to take just a  
22 minute and flip through it.

23                (Pause.)

24                BY MR. KNOWLES-KELLETT:

25           Q     Do you recognize this document?



1           A     Yes, sir.

2           Q     Okay. On the second page, is that your signature  
3 on the document?

4           A     It looks like my signature, but I don't believe  
5 I signed it.

6           MR. ROMNEY: I'm sorry, I didn't hear that answer.

7           THE WITNESS: I said it looks like my signature,  
8 but I don't believe that I signed it.

9           BY MR. KNOWLES-KELLETT:

10          Q     If I told you that the 22nd of June 1996, the date  
11 that appears on this document, was a Saturday and there was  
12 testimony that you, your sister Melissa and Norma, your  
13 mother, were going shopping with Pat and you signed this at  
14 Pat and Ronald's house, would that refresh your recollection  
15 that you might have signed this?

16          A     No, sir. I don't remember. I don't remember  
17 that.

18          Q     Okay. And is that -- I believe you testified  
19 earlier that you didn't recall signing anything with Hill  
20 for your Uncle Ronald?

21          A     I don't remember signing anything Hill. Correct.

22          Q     Okay. Is that the basis of your --

23          A     Yes, sir. I just don't remember.

24          MR. KNOWLES-KELLETT: Okay. I'm ready to pass the  
25 witness, Your Honor.

1 JUDGE STEINBERG: Okay.

2 Mr. Romney?

3 MR. ROMNEY: Thank you, Your Honor. I'm just  
4 getting rid of a cold lozenge.

5 JUDGE STEINBERG: Let me just ask Ms. Hill, do you  
6 want to take a little break?

7 THE WITNESS: No, I'm all right.

8 JUDGE STEINBERG: Okay.

9 CROSS-EXAMINATION

10 BY MR. ROMNEY:

11 Q Ms. Hill, my name is Mark Romney and I represent  
12 your Uncle Ron and your Aunt Pat and DLB Enterprises in this  
13 action.

14 Do you recall my taking your deposition in  
15 December?

16 A Yes, sir.

17 Q I want to go over some of these issues with you  
18 that you have discussed here with counsel for the FCC.

19 Let's take you to that exhibit you have in front  
20 of you at Exhibit 19. What page is that, 208?

21 Do you have that in front of you, ma'am?

22 A Yes, sir.

23 Q That looks like your signature, doesn't it?

24 A Yes, sir.

25 Q And does the hand on the date look like your

1 handwriting?

2 A No, sir.

3 Q And how are you so sure of that, ma'am?

4 A It just doesn't look like my handwriting. My  
5 handwriting is bigger than that.

6 Q Now, on the 22nd of June 1996, your last name was  
7 Hill. Is that right?

8 A Yes, sir.

9 Q You said that you believe that you had signed up  
10 for some license many years ago. Is that your testimony  
11 today?

12 A Yes, sir.

13 Q How long ago do you recall doing that?

14 A I think it was the early 1990s because I still  
15 lived at home. I lived at home with my parents while I was  
16 attending college and I did not graduate college until 1994.

17 Q Okay. In the course of your dealings with this  
18 matter regarding the FCC, you've had an occasion to hire an  
19 attorney. Is that right?

20 A Yes, sir. We did.

21 Q Mr. McVea?

22 A Yes, sir.

23 Q How did you get Mr. McVea's name?

24 A We contacted a family attorney in Dallas and asked  
25 him if he knew where we should go for an FCC lawyer or what

1 sort of counsel we should hire and he had yet another  
2 colleague who knew of Mr. McVea and we got in touch with him  
3 at that time.

4 Q Mr. McVea started to represent you and filed  
5 several documents on your behalf to the FCC? Is that right?

6 A Yes, he began representing us in the summer of  
7 1998.

8 Q And since the summer of 1998, you've submitted  
9 several items to the FCC. Is that correct?

10 A Yes, sir.

11 Q And you have gone back and looked at your  
12 documents and records that you might have at home? Is that  
13 right?

14 A Yes, sir.

15 Q Ms. Hill, in any of that timeframe, from summer of  
16 1998 until today as you sit here on the stand, have you been  
17 able to find or have you seen any documents pertaining to  
18 any earlier FCC application on your behalf?

19 A No, sir.

20 Q It's a fact, isn't it, ma'am, that the only  
21 documents that you've seen in this litigation since the  
22 summer of 1998 when you hired Mr. McVea up until the time  
23 you sit here on the stand today, the only documents you've  
24 seen that have anything do between you and the FCC pertains  
25 to this particular license at issue here. Is that right?

1           A     Yes, sir.

2           Q     You only recall signing one application to the  
3     FCC, right?

4           A     Yes.

5           Q     Okay. And would you not deduce, ma'am, that since  
6     you've not seen anything else and nobody has been able to  
7     show you any other documents that the only application you  
8     submitted to the FCC is this one here in question?

9           A     No, sir. I would not. I remember --

10          Q     You caused -- I'm sorry.

11                 JUDGE STEINBERG: Let Ms. Hill finish.

12                 BY MR. ROMNEY:

13          Q     Go ahead.

14          A     I remember very clearly that I lived with my  
15     mother and father when I signed that first one. I signed it  
16     at my kitchen table in my mother and father's house because  
17     Aunt Pat brought it over and I would not have done that in  
18     1996. In 1996, I was married and living with my husband and  
19     it was not custom practice for me in 1996 to go shopping  
20     with my aunt and my mother every Saturday. It was not  
21     custom practice even when I lived at home. My aunt and my  
22     mom went every Saturday, but me and my sister did not.

23          Q     Are you telling this Court that you've never gone  
24     shopping with your mother and your aunt on a Saturday?

25          A     I'm not saying I never went. I'm saying it's not

1 custom practice for me to go every Saturday. And it wasn't  
2 in '96 because I was not living with my mother.

3 MR. ROMNEY: Move to strike, Your Honor. There's  
4 no question in front of this witness. Nobody has ever even  
5 asserted that she went shopping every Saturday with her  
6 mother or her aunt.

7 JUDGE STEINBERG: I'll leave the answer on the  
8 record.

9 MR. ROMNEY: Thank you.

10 BY MR. ROMNEY:

11 Q Now, you have caused a search to be taken of the  
12 FCC data bank, have you not, ma'am, to find if there was any  
13 other prior FCC license?

14 A I don't know.

15 Q That's something you would really like to know,  
16 wouldn't you? If there is another FCC license out there?

17 A Yes, I guess I would.

18 Q And the name you believe you applied for that in?

19 A Sumpter. Jennifer Sumpter.

20 Q Jennifer Sumpter. You've never used any other  
21 names?

22 A No, sir.

23 Q Has anybody from the FCC told you whether or not  
24 they have tried to find a license in your name?

25 A No, sir.

1 Q Would you have expected them to in the course of  
2 this litigation, ma'am?

3 A Not necessarily, because I believe the talk was  
4 when we signed those years ago that Ronald had told us that  
5 he was going to -- it's the same thing I always thought,  
6 that if we got it in our name, he would transfer it to  
7 himself. So I guess I believed that if I had signed it back  
8 then and there had been a license issued in my name it would  
9 have already been transferred to Ronald Brasher or DLB,  
10 whatever.

11 Q Is it your understanding that your name would  
12 never show up on the FCC database somehow if there had been  
13 a transfer made over to Ronald Brasher or DLB Enterprises?  
14 Do you have any such understanding?

15 A I don't understand the question.

16 Q Well, I take it from your answer to my previous  
17 question that you believe that somehow because it would have  
18 been transferred over to your Uncle Ron that your name  
19 wouldn't be on the license any more. Is that what you  
20 understood?

21 A That's what I understand. Yes.

22 Q And is it your understanding that if there is a  
23 transfer that that changes the name on the database in the  
24 FCC and nobody can ever find one that was ever made in your  
25 name?

1           A     I don't know how the FCC's database is.

2           Q     And you're not telling the Court that you think  
3     that the database would be somehow manufactured so that they  
4     couldn't find one in your name?

5           A     No, I don't believe that.

6           Q     This earlier license that you believe you recall,  
7     did you sign some sort of an assignment form for your Uncle  
8     Ron?

9           A     I don't think so.

10          Q     Do you have any understanding how it could be  
11     transferred over to Uncle Ron's name without you signing  
12     some sort of assignment?

13          A     No, this is his business. It's not mine. I was  
14     never given any understanding of anything.

15          Q     But to the best of your recollection as you sit  
16     here today, ma'am, for this judge, you do recall filling out  
17     some sort of an application somewhere in the '90s. Is that  
18     right?

19          A     I recall signing an application. I've never  
20     filled out anything.

21          Q     Okay. But you signed an application.

22          A     Yes, sir. I believe I did in the early 1990s.

23          Q     Would you take before you, ma'am, Exhibit No. 54,  
24     please? I'll refer you to page 3 of that exhibit, ma'am.  
25                 Do you see that?



1 A Yes, sir.

2 Q And I believe your testimony is that is not your  
3 signature?

4 A That is not my signature.

5 Q Do you recognize that document, ma'am, as being  
6 your mother's signing of your name?

7 A No, sir. I do not.

8 Q Have you ever seen your mom sign your name?

9 A No, sir. I have not.

10 Q Are you familiar with your mother ever signing  
11 your name to any documents?

12 A No, sir. I don't believe she ever has.

13 Q Well, do you know?

14 A I don't know, but I don't believe she has.

15 Q You don't have any reason to know one way or the  
16 other, do you?

17 A I've never seen her, no.

18 Q Have you ever given her permission to sign your  
19 name for anything?

20 A Absolutely not.

21 Q Have you ever seen your mother sign your dad's  
22 name?

23 A No, sir. I have not.

24 Q You worked with her at the accounting office for  
25 your dad? Is that correct?

1           A     Yes, I did.

2           Q     Is it your testimony that in all those your years  
3     you worked with your mom and your dad at the accounting firm  
4     you never saw your mom sign your dad's name to anything?

5           A     I never saw my mom sign my dad's name. She signed  
6     all the checks, she signed them Norma Sumpter and he signed  
7     all the compilation reports Jim Sumpter and he signed them  
8     himself. Tax returns as well.

9           MR. ROMNEY: Your Honor, I'm trying to be very  
10    civil and restrained here, but I would appreciate an  
11    instruction to the witness that she only answer the  
12    questions that are in front of her instead of adding  
13    sidebars.

14          JUDGE STEINBERG: Well, I think that what she  
15    added was part of the answer to her question.

16          But I will ask, Ms. Hill, you know, just answer  
17    Mr. Romney's questions and if you need to add something,  
18    just answer it to the best of your ability and I'm not  
19    saying just say yes or no, but if it's something he doesn't  
20    ask about, don't volunteer it.

21          THE WITNESS: Okay.

22          JUDGE STEINBERG: But I interpreted that as being  
23    part of the previous answer.

24          MR. ROMNEY: Thank you, Your Honor.

25          MR. KNOWLES-KELLETT: I think to note for the